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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS IN RELATION
TO MOTION TO COMPEL DISCOVERY
FROM WAYMO REGARDING ITS
FORENSIC INVESTIGATION**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking, LLC’s Administrative
7 Motion to File Under Seal Exhibits in Relation to Motion to Compel Discovery from Waymo
8 Regarding Its Forensic Investigation (the “Administrative Motion”). The Administrative Motion
9 seeks an order sealing highlighted portions of Otto Trucking’s Letter Brief in Support of Its Motion to
10 Compel Discovery from Waymo Regarding Its Forensic Investigation (“Otto Trucking’s Motion”) and
11 of Exhibits 1 and 4-5 to the Declaration of Hong-An Vu, as well as the entirety of Exhibits 2-3, 6, and
12 8-12 thereto.

13 3. The yellow highlighted portions of Exhibit 2, the red highlighted portions of Exhibits
14 4-5 and 10, the green highlighted portions of Exhibits 6 and 8-9, and the entirety of Exhibits 11-12
15 contain or refer to confidential business information or non-public email addresses, which Waymo
16 seeks to seal.

17 4. Exhibit 2 (yellow highlighted portions in version filed herewith), Exhibits 4-5 (red
18 highlighted portions), Exhibit 10 (red highlighted portions in version filed herewith), and the entirety
19 of Exhibits 11-12 contain, reference, and/or describe Waymo’s highly confidential and sensitive
20 business information. Such information includes details regarding Waymo’s security measures and
21 protocols and detailed computer forensics regarding access to Waymo’s trade secrets. I understand
22 that Waymo maintains that this information as confidential. The public disclosure of this information
23 would cause significant competitive harm to Waymo, as its security measures and computer forensics
24 methods would become known to competitors who could use such information to Waymo’s
25 disadvantage. Exhibit 2 (yellow highlighted portions in version filed herewith) further describes the
26 identity of numerous individuals involved in the investigation and describes that involvement. Due to
27 the high public profile of this litigation, public disclosure of this information would cause harm to
28 Waymo and those employees.

